

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

EDISON GUIRACOCHA, : CHAPTER 13  
:   
Debtors, : BANKRUPTCY NO: 14-15752

**AMENDED**  
**NOTICE OF MOTION, RESPONSE DEADLINE**  
**AND HEARING DATE**

JOSEPH T. BAMBRICK, JR., ESQUIRE has filed with the Court on or about October 18, 2018, a Motion to Modify Chapter 13 Plan.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, **if** you have one **in** this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before November 8, 2018 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk of Bankruptcy Court  
The Madison Building  
400 Washington Street  
Suite 300  
Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

**Joseph T. Bambrick, Jr., Esquire**  
**JOSEPH T. BAMBRICK, JR., ESQUIRE**  
**529 Reading Avenue, Suite K**  
**West Reading, PA 19611**  
**Phone: 610-372-6400**  
**Fax: 610-372-9483**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling on Thursday, November 15, 2018, at 9:30 AM, in Courtroom 1, United States Bankruptcy Court, The Madison, 400 Washington Street, Reading, Pennsylvania.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

**Dated:** October 19, 2018

/s/Joseph Bambrick  
**Joseph T. Bambrick, Jr., Esq.**